



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re SONY BMG CD TECHNOLOGIES  
LITIGATION

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: Civil Action No. 05-CV-09575-NRB

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CLASS ACTION

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This Document Relates To:

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ALL ACTIONS.

x

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**NOTICE OF MOTION AND MOTION TO ADMIT COUNSEL *PRO HAC VICE* AND  
DECLARATIONS OF ROBERT M. ROTHMAN AND JENELLE WELLING IN  
SUPPORT THEREOF**

PLEASE TAKE NOTICE upon the annexed Declaration of Jenelle Welling, executed this 24 day of February, 2006, and the Certificate of Good Standing attached thereto, and the Declaration of Robert M. Rothman, Plaintiffs Tom Ricciuti, Yvonne Ricciuti, and Mary Schumacher move this Court, pursuant to Rule 1.3(c) of the Local Civil Rules of this Court, that Jenelle Welling, a member of the Bar of the State of California, be admitted *pro hac vice* for all purposes on behalf of plaintiffs in this action.

DATED: February 28, 2006

LERACH COUGHLIN STOIA GELLER  
RUDMAN & ROBBINS LLP  
ROBERT M. ROTHMAN (RR-6090)



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ROBERT M. ROTHMAN

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**DECLARATION OF ROBERT M. ROTHMAN**

I, Robert M. Rothman, declare as follows:

1. I am a member in good standing of the bar of this Court and a partner at Lerach Coughlin Stoia Geller Rudman & Robbins LLP. I make this declaration in support of Plaintiffs Tom Ricciuti, Yvonne Ricciuti, and Mary Schumacher's Motion, pursuant to Rule 1.3(c) of the Local Civil Rules of this Court, that Jenelle Welling be admitted *pro hac vice* for all purposes on behalf of plaintiffs in this action.

2. Jenelle Welling is fully familiar with this action.

3. As evidenced in the annexed Declaration of Jenelle Welling, she is an attorney in good standing of the Bar of the State of California.

4. I respectfully request that plaintiffs' motion be granted in all respects. A proposed Order is enclosed herewith.

I declare under penalty of perjury under the laws of the State of New York, that the foregoing is true and correct.

DATED: February 28, 2006

A handwritten signature in black ink, appearing to read "Robert Rothman", with a long horizontal flourish extending to the right.

ROBERT M. ROTHMAN (RR-6090)

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

In re:

SONY BMG CD  
TECHNOLOGIES LITIGATION

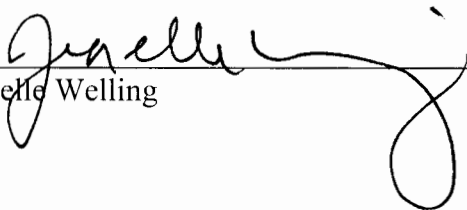
Case No. 1:05-cv-09575-NRB

**DECLARATION OF JENELLE WELLING IN SUPPORT OF  
MOTION FOR ADMISSION TO PRACTICE PRO HAC VICE**

Jenelle Welling, declares under penalty of perjury this 24 day of February , 2006:

1. I am an attorney at the law firm of Green Welling LLP, 595 Market Street, Suite 2750, San Francisco, California 94105.
2. I submit this Declaration in support of my motion for admission pro hac vice in the above-captioned matter.
3. As shown in the Certificate of Good Standing annexed hereto, I am a member in good standing of the bar of the United States District Court for the Northern District of California.
4. There are no pending disciplinary proceedings against me in any state or federal court.
5. Wherefore your affiant respectfully submits that she be permitted to appear as counsel and advocate pro hac vice in this one case on behalf of plaintiffs Tom Ricciuti, Yvonne Ricciuti, and Mary Schumacher.

I hereby swear under penalty of perjury that the foregoing is true and correct.

  
\_\_\_\_\_  
Jenelle Welling



THE  
STATE BAR  
OF CALIFORNIA

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180 HOWARD STREET  
SAN FRANCISCO, CALIFORNIA 94105-1639  
TELEPHONE (415) 538-2000

February 22, 2006

TO WHOM IT MAY CONCERN:

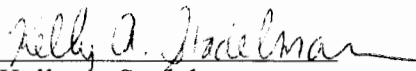
This is to certify that according to the records of the State Bar, JENELLE WELLING, #209480, was admitted to the practice of law in this state by the Supreme Court of California on December 4, 2000; and has been since that date, and is at date hereof, an ACTIVE member of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Governors or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

Waffa N. Saliti  
Custodian of Membership Records

**CERTIFICATE OF SERVICE**

I, Kelly A. Stadelmann, hereby certify that on March 1, 2006, I caused a true and correct copy of the attached Notice of Motion and Motion to Admit Counsel *Pro Hac Vice* to be served by first-class mail to all counsel on the attached service list.

  
Kelly A. Stadelmann



## Service List

<p>Scott A. Kamber (SK-5794)  <b>KAMBER &amp; ASSOCIATES, LLC</b>  19 Fulton Street, Suite 400  New York, New York 10038  Telephone: 212/571-2000  212/202-6364 (fax)</p> <p><i>Plaintiffs' Co-Lead Counsel</i></p>	<p>Sanford P. Domain (SD-8712)  Peter Safirstein (PS-6176)  <b>MILBERG WEISS BERSHAD &amp; SCHULMAN LLP</b>  One Pennsylvania Avenue  New York, New York 10119-0165  Telephone: 212/594-5300  212/868-1229 (fax)</p> <p><i>Plaintiffs' Executive Committee</i></p>
<p>Ira M. Press (IP-5313)  Mark A. Strauss (MS-2288)  <b>KIRBY McINERNEY &amp; SQUIRE, LLP</b>  830 Third Avenue  New York, New York 10022  Telephone: 212/317-2000  212/751-2540 (fax)</p> <p><i>Plaintiffs' Executive Committee</i></p>	<p>Jason L. Solotaroff (JS-5739)  Oren Giskan (OG-3667)  <b>GISKAN &amp; SOLOTAROFF</b>  207 West 25th Street  New York, New York 10001  Telephone: 212/847-8315  212/473-8096 (fax)</p> <p><i>Plaintiffs' Executive Committee</i></p>
<p>David Nester  <b>NESTER &amp; CONSTANCE, P.C.</b>  123 West Washington Street  Belleville, Illinois 62220-2021  Telephone: 618/234-4440  618/234-6193 (fax)</p> <p><i>Counsel for Plaintiffs</i></p>	<p>Robert I. Lax (RL-8413)  <b>ROBERT I. LAX &amp; ASSOCIATES</b>  535 Fifth Avenue, 21st Floor  New York, New York 10017  Telephone: 212/818-9150  212/818-1266 (fax)</p> <p><i>Counsel for Plaintiffs</i></p>
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Cindy Cohn  
Fred Von Lohmann  
Kurt Opsahl  
Corynne McSherry

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Mary Schumacher*